

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DARRELL SHAW a/k/a JOHN DARRELL  
SHAW and J. DARRELL SHAW &  
THERESA SHAW,

Plaintiffs,

v.

DELL FINANCIAL SERVICES LLC

Defendant.

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Case No. 1:16-cv-02739

Hon. Charles R. Norgle, Sr.

**DEFENDANT’S AGREED MOTION FOR  
EXTENSION OF TIME TO FILE A RESPONSIVE PLEADING**

Defendant Dell Financial Services LLC (“Dell”) by its attorneys, respectfully moves this Court for an extension of time for Dell to file a responsive pleading to Plaintiffs’ Complaint. In support thereof, Dell states as follows:

1. Plaintiffs filed a complaint against Dell on March 1, 2016.
2. On March 8, 2016, Plaintiffs served Dell.
3. Dell’s response to Plaintiffs’ Complaint is, therefore, due on Tuesday, March 29, 2016.
4. Dell requests a thirty (30) day extension of time in which to respond to Plaintiffs’ Complaint, such that its responsive pleading shall be due on April 28, 2016.
5. Counsel for Dell has spoken with counsel for Plaintiff, and Plaintiff has agreed to Dell’s request for an extension of time until April 28, 2016.

WHEREFORE, for the forgoing reasons, this Court should enter an order extending the time for Dell to answer or otherwise respond to Plaintiff’s Complaint until April 28, 2016.

Dated: March 15, 2016

Respectfully submitted,

KIMBALL R. ANDERSON,

By: /s/ Kimball R. Anderson  
One of Defendant's Attorneys

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**CERTIFICATE OF SERVICE**

The undersigned attorney states that, on March 15, 2016, she caused a true and correct copy of the above-described **AGREED MOTION FOR EXTENSION OF TIME TO FILE A RESPONSIVE PLEADING** to be served on counsel for Plaintiffs via the Court's electronic filing system:

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By: /s/ Loren G. Rene